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14
15 **IN THE UNITED STATES DISTRICT COURT**

16
17 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

18 **GENA HANSON**, individually and on behalf of
all others similarly situated,

19 Plaintiff,

20 v.

21 **JQD, LLC, d/b/a PRO SOLUTIONS**, a
California corporation;

22 Defendant.

) Case No. 3:13-cv-05377-RS
)
)
)) **JOINT SUPPLEMENTAL STIPULATED
[PROPOSED] PROTECTIVE ORDER**
)) Courtroom: 3
)) Judge: Hon. Richard Seeborg
))
))

1 WHEREAS Plaintiff Gena Hanson, individually and on behalf of others similarly situated, as a
2 part of the discovery process and in preparation for mediation, has requested that Defendant, JQD,
3 LLC, d/b/a/ Pro Solutions, (collectively, the “Parties”) produce its database of collection information
4 for all putative class members (hereafter the “Database”);

5 WHEREAS Defendant believes that the outstanding discovery requests are overbroad and call
6 for the production of confidential private information;

7 WHEREAS Plaintiff believes that the existing protective order, signed by the Court on
8 September 22, 2014, is sufficient to protect any privacy rights of the putative class members that may
9 be put at issue;

10 WHEREAS Defendant believes that the existing protective order signed by the Court on
11 September 22, 2014, is insufficient to protect the privacy rights of class members that may be put at
12 issue and it may be prohibited from producing the information plaintiff seeks without a court order;

13 WHEREAS Defendant is concerned about its limited insurance coverage and the fact that the
14 amount of coverage is reduced by the cost of the defense, and, therefore, desires to attempt to settle
15 this matter, and has proposed that the parties participate in a mediation,

16 WHEREAS Plaintiff has stated it cannot participate in a mediation without the information it
17 sought through discovery

18 NOW, THEREFORE, the Parties hereby STIPULATE that the Court enter a supplemental
19 protective order directing Defendant to provide the Database to Plaintiff, and order that (1) Plaintiff
20 shall treat the Database as “Attorney’s Eyes Only” information; (2) Plaintiff shall not contact any
21 putative class members prior to class certification or without the express permission of Defendant or

1 the Court (this does not preclude Plaintiff from discussing the case with any putative class members
2 who affirmatively contact Plaintiff); (3) production of the information requested does not constitute a
3 waiver of any privilege which would otherwise apply; (4) Plaintiff shall not contact any Homeowner's
4 Association identified in the Database without the express permission of Defendant or the Court; and,
5 (5) within 30 days of the conclusion of the case Plaintiff will return to Pro Solutions' counsel all copies
6 of the database and destroy all copies of documents obtained from it.

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8 Respectfully submitted,
9 Dated: March 3, 2015

COTCHETT, PITRE & McCARTHY, LLP

10 By: /s/ Justin T. Berger

11 NIALL P. McCARTHY
12 ANNE MARIE MURPHY
JUSTIN T. BERGER
13 SHAUNA R. MADISON

HOUSING AND ECONOMIC RIGHTS ADVOCATES
NOAH ZINNER
GINA DI GIUSTO

14
15 *Attorneys for Plaintiff and the Proposed Class*

16
17
18 Dated: March 3, 2015

LEWIS BRISBOIS BISGAARD & SMITH LLP

19 By: /s/ Stephen H. Turner

STEPHEN H. TURNER

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21 *Attorneys for Defendant JQD, LLC d/b/a*
PRO SOLUTIONS

1
2 **[PROPOSED] ORDER**
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4 Pursuant to the STIPULATION of the Parties, it is hereby ordered that Defendant shall provide
5 the requested Database to Plaintiff, and that (1) Plaintiff shall treat the Database as “Attorney’s Eyes
6 Only” information; (2) Plaintiff shall not contact any putative class members prior to class certification
7 or without the express permission of Defendant or the Court (this does not preclude Plaintiff from
8 discussing the case with any putative class members who affirmatively contact Plaintiff); (3)
9 production of the information requested does not constitute a waiver of any privilege which would
10 otherwise apply; (4) Plaintiff shall not contact any Homeowner’s Association identified in the
11 Database without the express permission of Defendant or the Court; and, (5) within 30 days of the
12 conclusion of the case Plaintiff will destroy the copy of the database and all copies of documents
13 obtained from it.

14 IT IS SO ORDERED.
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16 DATED: 3/4/2015
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18 Honorable Richard Seeborg
19 Judge for the United States District Court
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